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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO GONZALEZ,

Defendant.

CASE NO. 2:20-CR-00013 WBS

STIPULATION AND ORDER TO CONTINUE
JUDGMENT AND SENTENCING HEARING AND
MODIFY PRESENTENCE SCHEDULE

DATE: February 26, 2024
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for judgment and sentencing on February 26, 2024.
2. By this stipulation, the parties now move to continue the judgment and sentencing hearing until May 6, 2024 at 9:00 a.m. The parties understand that this date is available to the Court for a continued judgment and sentencing hearing.
3. The assigned probation officer is working to complete the presentence investigation process, and an extended timeline for the presentence report is necessary. Moreover, the parties desire additional time to conduct investigation of matters that may be relevant to sentencing.
4. It is therefore requested that the PSR and judgment and sentencing schedule be modified as follows:

- a) Proposed Presentence Report Due: April 1, 2024
- b) Written Objections to Presentence Report Due: April 8, 2024
- c) Presentence Report Due: April 15, 2024
- d) Motion for Correction of Presentence Report Due: April 22, 2024
- e) Reply or Statement Due: April 29, 2024
- f) Judgment and Sentencing: May 6, 2024, 9:00 a.m.

IT IS SO STIPULATED.

Dated: February 21, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ EMILY G. SAUVAGEAU

EMILY G. SAUVAGEAU
JAMES R. CONOLLY
Assistant United States Attorneys

Dated: February 21, 2024

/s/ TAMARA SOLOMAN

TAMARA SOLOMAN
Counsel for Defendant
MARIO GONZALEZ

ORDER

IT IS SO FOUND AND ORDERED.

Dated: February 21, 2024



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE